

Appl. No. 10/781,108
Amdt. dated February 21, 2006
Reply to Office action of November 25, 2005

REMARKS

Applicants have received the Office action dated November 25, 2005, in which the Examiner: 1) rejected claims 1, 7, 16-18, 21 and 22 under 35 U.S.C. § 103(a) as allegedly unpatentable over Gupta (U.S. Pat. No. 5,887,164, hereinafter "*Gupta*") in view of Natu (U.S. Pat. No. 5,790,850, hereinafter "*Natu*"); 2) rejected claims 2-5 under 35 U.S.C. § 103(a) as allegedly unpatentable over Gupta in view of Natu and further in view of Davis (U.S. Pat. No. 6,205,850, hereinafter "*Davis*"); and 3) rejected claims 8-10, 12-15 and 19-20 under 35 U.S.C. § 103(a) as allegedly unpatentable over Gupta in view of Natu and in further view of Klimenko (U.S. Pat. No. 5,974,547, hereinafter "*Klimenko*").

With this Response, Applicants amend claims 1, 3-5, 7-11 and 17 and present new claims 23-25. Reconsideration is respectfully requested

I. CLAIM REJECTIONS

A. Claim 1

Claim 1 stands rejected as allegedly obvious over Gupta and Natu. Applicants amend claim 1 to remove limitations not needed to define over the cited art, and to more clearly define over Gupta's host computer 40 and target computer 20, which plugs into the host computer 40.

Gupta is directed to a system and method for enabling a target computer to use storage resources of a host computer. (Gupta Title). In particular, Gupta appears to be directed to a target computer 40 which is an add-in card of a host computer 20. (Gupta Col. 5, lines 39-41; Col. 5, lines 60-62; Col. 12, lines 24-27). The disk drive 28 of the host computer 20 stores an OS image 56, which OS image 56 is used to boot the target computer 40. (Gupta Col. 5, lines 10-12). The interrupt 13h handler of the target computer 40 is modified to intercept disk drive requests, and forward those requests to a device driver 62 of the host computer system, which device driver 62 provides requested portions of the OS image file 56. (Gupta Col. 7, lines 11-16). Thus, the disk drive 28 of the host computer appears as a virtual disk drive of the target computer 40. (Gupta Col. 12, lines 56-62; Col. 2, lines 11-23). Natu is directed to fault resilient booting for multiprocessor computer systems.

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Claim 1, by contrast, specifically recites, "a random access memory (RAM) coupled to the processor; and a bridge device coupling a system bus to the processor, the system bus configured to couple to an expansion bus of a managed computer system comprising a disk drive; wherein the RAM is configured to hold a bootable image for the managed computer system, and wherein the processor is configured to emulate a disk drive device storing the bootable image, and to boot the managed computer system from the bootable image stored in the RAM." In Gupta, the host computer 20 with the disk drive 28 (managed computer in the claim parlance) is used to boot the target computer 40 (the system of claim 1). Thus, even if hypothetically the teachings of Natu are precisely as the Office action suggests (which Applicants do not admit), Gupta and Natu still fail to teach a system "configured to couple to an expansion bus of a managed computer system comprising a disk drive" and "wherein the processor is configured ... to boot the managed computer system from the bootable image stored in the RAM."

Based on the foregoing, Applicants respectfully submit that claim 1 is not rendered unpatentable by Gupta and Natu, and should be allowed together with all claims which depend from claim 1 (claims 2-5, 7-10 and 23-25). Applicants amend claims 3-5 and 7-10 to reflect the amendments to claim 1. Applicants present new claim 23 to reinstate the removed limitation from claim 1 as a dependent claim, and new claims 24 and 25.

B. Claim 11

Claim 11 stands rejected as allegedly obvious over Gupta and Natu. Applicants amend claim 11 to remove limitation not needed to define over the cited art, and to more clearly define over Gupta's host computer 40 and target computer 20, which plugs into the host computer 40.

Claim 11, by contrast, specifically recites, "transferring a bootable image for a managed computer system to a memory of a management sub-system within the managed computer system; and emulating a floppy drive by the management sub-system to boot the managed computer system from the bootable image in the memory of the management sub-system." In Gupta, the

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host computer 20 with the disk drive 28 (managed computer in the claim parlance) is used to boot the target computer 40 (the management sub-system in the claim parlance). Thus, even if hypothetically the teachings of Natu are precisely as the Office action suggests (which Applicants do not admit), Gupta and Natu still fail to teach "transferring a bootable image for a managed computer system to a memory of a management sub-system within the managed computer system; and emulating a floppy drive by the management sub-system to boot the managed computer system from the bootable image in the memory of the management sub-system."

Based on the foregoing, Applicants respectfully submit that claim 11 is not rendered unpatentable by Gupta and Natu, and should be allowed together with all claims which depend from claim 11 (claims 12-16).

C. Claim 17

Claim 17 stands rejected as allegedly obvious over Gupta and Natu. Applicants amend claim 17 to remove limitation not needed to define over the cited art, and to more clearly define over Gupta's host computer 40 and target computer 20, which plugs into the host computer 40.

Claim 17 specifically recites, "a memory coupled to the processor, the memory storing a bootable image for a managed computer system comprising a disk drive and an expansion bus; and a bridge device coupling a system bus to the processor, and wherein the system bus is configured to couple to the expansion bus of the managed computer system; wherein the processor is configured to emulate a disk drive device storing the bootable image, and the processor is further configured to boot the managed computer system from the bootable image stored in the memory." In Gupta, the host computer 20 with the disk drive 28 (managed computer in the claim parlance) is used to boot the target computer 40 (the management sub-system in the claim parlance). Thus, even if hypothetically the teachings of Natu are precisely as the Office action suggests (which Applicants do not admit), Gupta and Natu still fail to teach "a memory coupled to the processor, the memory storing a bootable image for a managed

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computer system" and "the processor is further configured to boot the managed computer system from the bootable image stored in the memory."

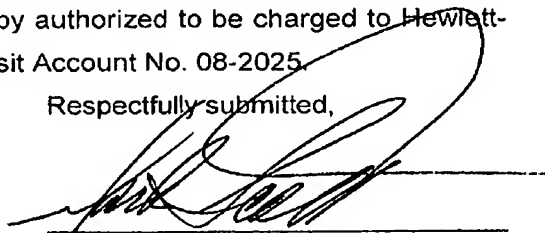
Based on the foregoing, Applicants respectfully submit that claim 17 is not rendered unpatentable by Gupta and Natu, and should be allowed together with all claims which depend from claim 17 (claims 18-22).

II. CONCLUSION

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the cited art which have yet to be raised, but which may be raised in the future.

Applicants respectfully request reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,



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